



County of Los Angeles CHIEF EXECUTIVE OFFICE

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500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

WILLIAM T FUJIOKA
Chief Executive Officer

June 7, 2010

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Justin Seastrand, Special Uses Coordinator
U.S. Department of Agriculture Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Dear Mr. Seastrand:

RESPONSE TO THE RELEASE OF THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT TO SOUTHERN CALIFORNIA EDISON'S TEHACHAPI RENEWABLE TRANSMISSION PROJECT (CALIFORNIA STATE CLEARINGHOUSE NO. 2007081156)

On April 30, 2010, the U.S. Department of Agriculture Forest Service released the Supplemental Draft Environmental Impact Statement (SDEIS) for the Tehachapi Renewable Transmission Project (Project) proposed by Southern California Edison (SCE). On April 6, 2009, the County provided comments on the Draft EIR/EIS to the California Public Utilities Commission (CPUC). On November 30, 2009, the County provided additional comments in response to the Final EIR/EIS for this Project to the CPUC. We have reviewed the SDEIS and our comments and concerns are outlined in the departmental letters attached. Although not included, the Departments of Parks and Recreation and Public Health reviewed the SDEIS and had no additional comments.

If you have any questions, please contact Dorothea Park at (213) 974-4283, or via e-mail at dpark@ceo.lacounty.gov. If you need clarification regarding specific comments in the attachments, please contact the respective County department staff identified in the attached letters.

Sincerely,

WILLIAM T FUJIOKA
Chief Executive Officer

WTF:BC
DSP:JO:os

Attachments

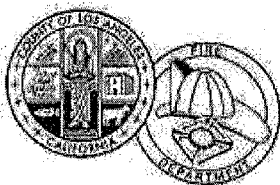
- c: Supervisor Gloria Molina, First District
Supervisor Mark Ridley-Thomas, Second District
Supervisor Zev Yaroslavsky, Third District
Supervisor Don Knabe, Fourth District
Supervisor Michael D. Antonovich, Fifth District
P. Michael Freeman, Fire Chief
Richard J. Bruckner, Director of Regional Planning
Gail Farber, Director of Public Works

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"To Enrich Lives Through Effective And Caring Service"

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Intra-County Correspondence Sent Electronically Only***

FIRE DEPARTMENT



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

May 27, 2010

William T Fujioka, CEO
Chief Executive Office, Room 713
500 West Temple Street
Los Angeles, CA 90012

Dear Mr. Fujioka:

DRAFT ENVIRONMENTAL IMPACT STATEMENT, DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR THE EDISON TEHACHAPI RENEWABLE TRANSMISSION PROJECT, TEHACHAPI (FFER #201000087) - REVISED

The Draft Environmental Impact Statement has been reviewed by the Planning Division, Land Development Unit, Forestry Division, Health Hazardous Materials and the Air and Wildland Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have no comments at this time.

LAND DEVELOPMENT UNIT:

1. The Statutory Responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for Fire Fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (Cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for All County facilities, located within non-contract Cities. The County of Los Angeles Fire Department, Land Development Unit, may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWSDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDALE	IRVINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
		LA HABRA					WHITTIER

William T Fujioka, CEO
May 27, 2010
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2. This project shall comply with the County of Los Angeles Fire Department Regulation 27: "Requirements for Building Construction and Land Use Within or Adjacent to High Voltage Transmission Lines".
3. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit Inspector Scott Jaeggi at (323) 890-4243.

AIR AND WILDLAND DIVISION

1. This project shall comply with all FAA requirements, including but not limited to, FAA Advisory Circular 70/7460-1K, dated February 1, 2007.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The following should be addressed prior to implementation of the project:
 - a. A Site Health and Safety Plan to address potential or actual site hazards including workers potential exposure to contaminated soil and or hazardous materials.
 - b. A Soil Management Plan to address discovery and management of contaminated soils. The Soil Management Plan should include provisions for proper removal and disposal of soil generated during excavation and grading.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



John JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:lj

**DEPARTMENT
OF
PUBLIC WORKS**



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
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ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: **LD-1**

June 2, 2010

Mr. John Boccio, CPUC, CEQA Project Manager
Mr. Justin Seastrand, Special Uses Coordinator
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 90301

Dear Mr. Boccio and Mr. Seastrand:

SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS) TEHACHAPI RENEWABLE TRANSMISSION PROJECT

Thank you for the opportunity to review the SDEIS for the Tehachapi Renewable Transmission project. Southern California Edison (SCE) proposes to construct, use, and maintain new and upgraded transmission infrastructure along approximately 173 miles of new and existing right of way from the Tehachapi Wind Resource Area in Southern Kern County, south through Los Angeles County and the Angeles National Forest, and east to the existing Mira Loma Substation in San Bernardino County.

The SDEIS reevaluates the project's effects in light of the changed conditions caused by the Station Fire, which burned in the Angeles National Forest from August 26, 2009, to October 16, 2009. The SDEIS also analyzes the impacts associated with certain changes to SCE's proposed project that affects National Forest System lands.

The following comments are for your consideration and relate to the environmental document only:

Road

We recommend that care be taken when scheduling construction on Angeles Forest Highway, Aliso Canyon Road, Big Tujunga Canyon Road, and Upper Big Tujunga Canyon Road. These roadways are commuter routes to the

Mr. John Boccio
Mr. Justin Seastrand
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Los Angeles Basin, and we want to minimize impact to the commuters. Construction permits will be required for lane/road closures or for any work within the road right of way. The following are general comments:

1. No towers, footings, and/or transmission lines are to be constructed within the road right of way or on any United States Forest Service (USFS)-permitted roadways.
2. Any proposed construction within our road right of way, or on any USFS-permitted roadways, will require a construction permit from Public Works' Construction Division and/or the USFS.

For any questions regarding the road comments, please contact Mr. Glenn Tong at (661) 947-7173, Extension 230, or by e-mail at gtong@dpw.lacounty.gov.

Hazards-Geotechnical/Soils/Geology

The Final Environmental Impact Report adequately addresses the geotechnical hazards and provides the appropriate mitigation. However, the original geotechnical report by Geotechnical Consultants, Inc. (2008), with the signed and stamped signature page, should be made part of the SDEIS.

For any questions regarding the geology comments, please contact Mr. Jeremy Wan at (626) 458-4925 or by e-mail at jwan@dpw.lacounty.gov.

Hazards-Flood Maintenance

This project may affect several of Public Works' Flood Maintenance Division facilities. Some of the facilities include: Eaton Wash, San Gabriel River, and the Santa Fe Spreading Grounds. At this time, we cannot comment on the degree of impact this project would have from a maintenance standpoint until more specific information such as construction plans, at a standard scale, are available.

1. This project may impact Army Corps of Engineers facilities, which may require their review and approval.
2. All location maps should identify the location of Eaton Wash Dam and Reservoir.

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3. The area affected by the proposed project contains Los Angeles County Flood Control District facilities. If the project proposes a future connection to any of these facilities, a connection permit from Public Works' Construction Division is required.
4. The proposed project, Segment 11, appears to cross the back end of Big Tujunga Reservoir and proposes to expand SCE's existing 320 foot right of way to 360 feet. This would not have an impact on our reservoir's operations or cleanouts, provided the towers are located outside of the reservoir and the Los Angeles County Flood Control District is given written assurances that it can perform cleanouts on the reservoir bottom (underneath the 40 foot right-of-way expansion).

If you have any questions, please contact Ms. Belinda Kwan at (626) 458-6135 or by e-mail at bkwan@dpw.lacounty.gov.

Hazards-Water Quality

Although the response to comments on the original Environmental Impact Report, for the proposed project, indicates that the project will not include placement of any infrastructure within a perennial waterway, it does acknowledge that the project may include placement of some above-ground features within other natural drainage pathways. The Final Environmental Impact Report, for the original project, notes that measures will be implemented to address potential flooding impacts to those above-ground features, but does not adequately address the potential for those same features to divert flood flows or increase flood risk for adjacent property. Additional mitigation measures should be proposed to address this issue as previously requested.

If you have any questions, please contact Ms. Marcela Benavides at (626) 458-4166 or by e-mail at mbenavid@dpw.lacounty.gov.

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Mr. Justin Seastrand
June 2, 2010
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If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or by e-mail at tduong@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



DENNIS HUNTER, PLS PE
Assistant Deputy Director
Land Development Division

RC:ca
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**DEPARTMENT
OF
REGIONAL
PLANNING**



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

May 20, 2010

TO: William T Fujioka
Chief Executive Officer

FROM: Richard J. Bruckner 
Director

**SUBJECT: SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT
SOUTHERN CALIFORNIA EDISON
TEHACHAPI RENEWABLE TRANSMISSION PROJECT**

The Department of Regional Planning (DRP) submitted written comments on the Draft Environmental Impact Report/Statement (DEIR/S) regarding Southern California Edison's proposed Tehachapi Renewable Transmission Project (TRTP) on April 6, 2009. On November 16, 2009, the DRP submitted comments on the Final Environmental Impact Report/Statement (FEIR/S). The comments related to potential negative environmental impacts the project may create for residents and properties located within the unincorporated communities of Los Angeles County in proximity to the existing and proposed Edison right-of-way designated to accommodate the project. The DEIR/S and the FEIR/S were joint Federal and State environmental documents prepared for review by the California Public Utilities Commission (CPUC) as the Lead Agency under the provisions of the California Environmental Quality Act and the National Environmental Policy Act.

As the FEIR/S was about to be published by the CPUC the Forest Service decided to prepare a Supplemental Draft Environmental Impact Statement to address the changed conditions caused by the Station Fire. The Forest Service and the CPUC agreed that the further review of post-fire conditions by the Forest Service should not delay the CPUC's separate decision on the project. The CPUC proceeded with publication of the FEIR/S on October 30, 2009, issued a Proposed Decision for the project on November 3, 2009 and certified the FEIR/S on December 7, 2009. A Notice of Determination was received from CPUC by the State Clearinghouse on December 21, 2009. The CPUC action does not affect lands under Federal jurisdiction. The TRTP has not, as yet, been approved on lands under the jurisdiction of the Forest Service.

**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT
TEHACHAPI RENEWABLE TRANSMISSION PROJECT
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The DRP has now completed review of a Supplemental Draft Environmental Impact Statement (SDEIS). The SDEIS has been prepared by the United States Department of Agriculture Forest Service (Forest Service) as the Lead Agency under the provisions of the National Environmental Policy Act. The SDEIS was prepared to assess the changed conditions created by the Station Fire which burned approximately 251 square miles of land within the Angeles National Forest between August 26, 2009 and October 16, 2009. The burned area includes large portions of Segments 6 and 11 of the project. Approximately 75% of the project area within the National Forest was affected by the fire.

In addition, project changes proposed by Southern California Edison following completion of the DEIR/S, including nine additional transmission towers and changes in tower design, additional helicopter staging and support areas, pulling/splicing locations and alternate access roads and changes in the project's schedule, are analyzed in the SDEIS. All of the proposed project changes addressed in the document will be located within the boundaries of the Angeles National Forest.

The following is a brief commentary regarding proposed project changes within the boundaries of the Angeles National Forest:

Transmission Towers

Southern California Edison proposes to construct nine additional transmission towers within the Forest which were not evaluated as part of the DEIR/S. The height of the new structures will range from 147 to 262 feet, whereas the towers that were originally proposed, the single-circuit 500-kV delta towers, were proposed to have heights ranging from 107 to 198 feet.

The new towers will be double-circuit LST structures with no cross arms on the easterly sides of the towers, but will include middle cross arms lengthened by eight feet for the purpose of providing protection from electrical arcing that could be caused by shedding of ice.

Although the SDEIS refers to the towers by numbered references, there is no accompanying map to depict the exact location of the towers. The document states that towers will be located on Segment 11 which is proposed to run in a north/south direction between the Vincent Substation in the Acton area and the Gould Substation located above the City of La Canada Flintridge.

It would appear that the heightened towers will not create significant visual impacts to communities on either the northerly or southerly boundaries of the Forest. However, without a map depicting their exact location, a definite conclusion cannot be reached. The document does discuss visual impacts within the Forest but makes no specific reference to visual impacts to adjoining communities.

**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT
TEHACHAPI RENEWABLE TRANSMISSION PROJECT
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The SDEIS should make specific reference to potential visual impacts to communities adjoining the National Forest.

Helicopter Assembly Yards (HAYs)

Nine additional Helicopter Assembly Yards (HAYs) are proposed as staging areas for helicopters that will be utilized in the construction of 33 towers along Segments 6 and 11. The SDEIS states that additional towers may be added to the list of those currently planned to be constructed with the assistance of helicopters. The HAYs discussed in the SDEIS are all located within the boundaries of the National Forest. The SDEIS states that development of the additional HAYs is intended to improve the efficiency of the construction operation. The document implies that this efficiency will result in reduced flight time for the helicopters but it does not make a specific statement to that effect.

None of the proposed HAYs are depicted as being in proximity to unincorporated communities.

Access Road Changes

The DEIR/S stated that the miles of new, improved and maintained roads on Forest Service lands in Segments 6 and 11 would total 91 miles. The SDEIS states that with subsequent proposed additions and deletions the total will reach 98 miles. The construction of approximately seven miles of additional unpaved roadways within the National Forest does create the potential for an increase in unauthorized use of these roadways. The SDEIS includes conflicting statements regarding the installation of gates. The DRP strongly advocates the installation of heavy-duty steel gates by Southern California Edison at the entrances of the new roadways. The gates should be secured during nighttime hours when construction is not taking place. They should be permanently secured, except for access by authorized personnel, following completion of construction activities.

One of the primary changes to project construction resulting from the Station Fire noted in the SDEIS will be the increased need for road repairs and reconstruction. Residents attempting to utilize the Forest for recreational purposes can expect additional inconveniences as a result of the cumulative impacts of project-related and fire-related roadway repair/construction activities within the boundaries of the National Forest. Therefore, the DRP recommends that the movement of heavy, slow moving, project-related equipment not be allowed during the weekends on roadways accessed by the general public within the National Forest.

It does not appear that proposed roadway repair/construction work will impact unincorporated area communities.

**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT
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Wire Setup Pulling/Splicing Site Changes

The locations for three wire setup pulling/splicing sites are proposed to be changed. The sites are locations where pulling and splicing of wires will take place. Each of the sites is located in close proximity to a proposed transmission tower within the Forest.

No additional impacts to adjoining unincorporated area communities are anticipated as a result of these new locations.

Construction Schedule

The DEIR/S anticipated that TRTP construction would begin in October of 2010 for Segments 6 and 11 within the National Forest. The SEIS currently anticipates a starting date in December of 2010, a two month delay. Completion of the project is estimated for December 2014.

No additional impacts to adjoining unincorporated area communities are anticipated as a result of the proposed change in schedule.

Helicopter Staging Areas for Operations and Maintenance

The DEIR/S described a scenario in which helicopter staging areas would be abandoned and reclaimed biologically. In the DRP commentary dated April 6, 2009, we recommended that the staging areas be maintained for possible future use by the County Fire Department during brush fire scenarios. The FEIR/S did not respond favorably to our proposal.

Currently the SDEIS proposes that helicopter staging areas be continuously maintained for the purpose of accommodating helicopters that will be used for the maintenance of the transmission towers. DRP supports this proposal because it can allow for joint use of the helicopter staging areas by Southern California Edison, the Forest Service and the Los Angeles County Fire and Sheriff's Departments. The negative impact to biological resources would be very minor.

The proposed ongoing maintenance of helicopter staging areas within the boundaries of the National Forest has a potentially beneficial impact for adjoining unincorporated area communities.

Should you have any questions or concerns, please contact me at (213) 974-6401 or Paul McCarthy of my staff at (213) 974-6461 or via e-mail at pmccarthy@planning.lacounty.gov, Monday through Thursday from 7:00 a.m. to 6:00 p.m. Our offices are closed on Fridays.

RJB:PM:pm